

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE)
COMPANY, JOHN HANCOCK)
VARIABLE LIFE INSURANCE)
COMPANY, and MANULIFE)
INSURANCE COMPANY (f/k/a)
INVESTORS PARTNER LIFE)
INSURANCE COMPANY),)

Civil Action No. 05-11150-DPW

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

**ABBOTT LABORATORIES' ASSENTED TO MOTION
FOR IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Defendant Abbott Laboratories ("Abbott")

respectfully moves this Court for leave to file the following documents under seal until further
Order of the Court:

a. Abbott Laboratories' Motion for Leave to File a Reply Memorandum in
Support of Its Motion to Prohibit the Disclosure of Abbott Laboratories' Highly Confidential
Documents to Dr. Fairweather Pursuant to the Stipulated Protective Order (with attached Exhibit
A -- Abbott Laboratories' Reply Memorandum in Support of Its Motion to Prohibit the
Disclosure of Abbott Laboratories' Highly Confidential Documents to Dr. Fairweather Pursuant
to the Stipulated Protective Order) (the "Motion"); and

b. Supplemental Declaration of Ozge Guzelsu (the "Declaration");

The grounds for this motion are:

1. This action arises out of a certain Research Funding Agreement (the “Agreement”) dated March 13, 2001 between John Hancock (“John Hancock”) and Abbott. The Agreement is, by its terms, confidential.

2. The Motion and Declaration include confidential information regarding Abbott’s development of certain compounds.

3. In compliance with Local Rule 7.1(A)(2), Abbott has sought and obtained the consent of John Hancock to this Motion for Impoundment of Confidential Information.

WHEREFORE, Abbott respectfully requests that the Motion and Declaration be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept these documents provisionally under Seal pending the Court’s ruling on this Motion. Upon termination of the impoundment period, Abbott will retrieve and take custody of the Motion and Declaration.

Dated: December 1, 2006

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S. D'Orsi
Michael S. D'Orsi

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Counsel for Abbott Laboratories

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 1, 2006.

Date: December 1, 2006.

/s/ Michael S. D'Orsi
Michael S. D'Orsi